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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

DONALD J. TRUMP et al.

Plaintiffs,

v.

META PLATFORMS, INC. et al.,

Defendants.

Case No: 4:21-cv-09044-JSW

**ADMINISTRATIVE MOTION FOR
LEAVE TO FILE PLAINTIFF DONALD
J. TRUMP'S RESPONSE IN
OPPOSITION TO THE MOTION AND
MEMORANDUM OF LAW BY
INTERVENOR UNITED STATES OF
AMERICA IN SUPPORT OF THE
CONSTITUTIONALITY OF 47 U.S.C. §
230(c)**

Judge: Hon. Jeffrey S. White

Donald J. Trump requests leave to file a response (the "Response") to the Motion to Intervene and Memorandum of Points and Authorities in Support of the Constitutionality of U.S.C. § 230(c) (Fed. R. Civ. P. Rule 5.1) (the "USA Motion") filed by the United States of America (the "USA" or "Government") on January 14, 2021, Document 155 ("Dkt. 155"), for the following reasons.

Plaintiffs' First Amended Complaint challenges the construction and constitutionality of Section 230. As noted in the Government's Motion to Intervene, Plaintiff also asserts said unconstitutionality as applied in his Motion for Preliminary Injunction. (USA Mot. at 1). Therefore, Plaintiff should be allowed to respond to the Government and address the issues raised in its Motion in order to demonstrate that the Government's arguments do not support their conclusion that Section 230 is constitutional. The United States has consented to the filing of Plaintiff's Response.

ACCORDINGLY, Plaintiff respectfully requests that the Court accept for filing the response attached hereto as Exhibit "1" and issue the [Proposed] Order Granting Plaintiff Leave to File the Response.

Dated: February 11, 2022

Respectfully submitted,

By: /s/ John P. Coale
John P. Coale

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